

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Nacme Steel Processing, LLC
429 W 127th St
Chicago, IL 60628

ATTENTION:

Matt Eich
Maintenance Supervisor
meich@nmlp.com
Nacme Steel Processing, LLC

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Nacme Steel Processing, LLC (Nacme or you) to submit certain information about the facility at 429 W 127th St in Chicago, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 21 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Nacme owns and operates an emission source at its Chicago, Illinois facility. We are requesting this information to determine whether you are complying with your federally enforceable state operating permit.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Nacme to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Brittany Cobb at cobb.brittany@epa.gov or 312-353-1248 to make arrangements to submit your response.

Nacme must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Nacme to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Brittany Cobb at cobb.brittany@epa.gov or 312-353-1248.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

The “*Facility*” means your facility at 429 West 127th St in Chicago, Illinois.

“*Air pollution control equipment*” means the air pollution control equipment identified in your Federally Enforceable State Operating Permit, ID Number 031600FWL.

“*Ancillary equipment*” means any devices including, but not limited to, such devices as piping, fittings, flanges, valves, pumps, nozzles, ductwork, and enclosures that are used to distribute, meter, contain or control the flow of Hazardous Air Pollutants (HAPs).

“*Component*” means the pickling tank, storage, and ancillary equipment of the steel coil pickling line and air pollution control equipment at the Facility.

“*Hazardous Air Pollutants*” means any air pollutant listed in or pursuant to section 112 (b) of the Clean Air Act.

“*Modification*” means any physical change in, or change in the method of operations, of an emission source or any component thereof, or of air pollution control equipment, or any component thereof.

“*Modify*” means to make any physical change in, or change in the method of operations, of an emission source or any component thereof, or of air pollution control equipment

“*Steel coil pickling line*” means the steel coil pickling line, including all pickling tanks, the coil washer exhausted to turbo-tunnel enclosure, and all hydrochloric acid storage tanks and temporary storage tanks, at the Facility.

All other terms used in this information request shall have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

Appendix B

Information You Are Required to Submit to EPA

Nacme must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. For the period from September 1, 2017 to December 9, 2021, provide the following information for the Facility's steel coil pickling line and air pollution control equipment.

If available, you may produce this in an unlocked electronic spreadsheet:

- a. The dates (month, day, and year) when each component was constructed, replaced or modified, including date ranges when construction, replacement or modification occurred over a period of days;
 - b. A description of the process by which each component was constructed, replaced or modified;
 - c. The make and model of each component that was constructed, replaced, installed to replace, or modified; and
 - d. The amount, in dollars, spent to construct, modify, or purchase and install a replacement of, each component, including any design costs, insurance, maintenance, labor, and overhead.
2. Provide the current standard operating procedures for the steel coil pickling line and air pollution control equipment. Identify and describe any changes in the standard method of operations from September 1, 2017 to December 9, 2021.
 3. Identify and describe the changes in the facility's steel pickling process, including physical change in, or change in the method of operations, that resulted in the increased

emission rate from 0.024 pounds per hour in the January 26, 2016 stack test to 0.52 pounds per hour in the May 7, 2021 stack test.

4. Identify the heat source of the steel coil pickling line.
5. If the heat source is a boiler, specify the following:
 - a. The type of boiler (e.g., industrial);
 - b. The boiler's fuel source;
 - c. The year the boiler was installed;
 - d. The boiler's rating, in MMBtu/hour.